<u>REMARKS</u>

Claims 1 through 7 and 10-29 are pending in the application. Claims 8 and 9 were previously canceled. Claims 1, 10, 15, 20, 21, 23, 24 are amended. Support for these amendments can be found, among other places, in FIGURE 2 and FIGURE 8 and on page 9, line 29 to page 10, line 27 of the present application. Applicant also amends claims 15, 23 and 24 to remove "means plus function" claim language.

Applicant submitted an "Amendment after Final" on December 21, 2004 in response to a Final Office Action of October 21, 2004. The "Amendment After Final" was not entered by the Examiner. Applicant then filed an RCE on March 21, 2005. The present Preliminary Amendment is to be entered before examination of that RCE. Applicant respectfully overcomes the rejections as contained within the prior Final Office Action with the amended claims of the present Preliminary Amendment.

Claims 25 to 29 are new. New claims 25-29, which correlate to the un-entered amendments of independent claims 1, 10, 15, 21, respectively, of the December 21, 2004 Amendment After Final, are also requested to be entered. Favorable consideration is respectfully urged.

In the Final Office Action of October 21, 2004 ("the Office Action"), claims 1, 10, 15, and 20-24 were rejected under 35 USC 102(a) as being anticipated by U.S. Patent No. 5,911,776 to Guck ("Guck").

Guck is directed to a network providing a server using an object-database enabling an author to create and store an original document, as a source file with a first format. Software in the data base purportedly provides multiple sets of shadow file-converter groups to the source file of the original document (Abstract). The shadow file does not have any content, but merely points back to the first source file with certain object connecting techniques called "relationships." (Column 4, lines 45-48.) Guck discloses selecting among various formats to reformat documents. (Column 6, lines 49-64). Thus, in Guck, conversions take place from one format to another format, but with no changes of presentation or structure within the messages.

The present invention of claim 1 as amended is directed to a method for composing a computer message. In the method of claim 1, a message composition area (such as message text 68 of FIGURE 2) has at least one text field and at least one associated selection field. The formatted message structured according to both of said one of said output formats and a selection field data from said at least one associated selection field (such as selection field 72 of FIGURE 2).

In Guck, although a conversion occurs from a first format to a second format, the user is unable to specifically enter in further data into the associated selection field about how the data is to be presented ("metadata," i.e., data about data). In the present claim 1 as amended, however, a user enters, not only the format in which the converted data is to be presented, but how the data is to be structured in its presentation of the format. For instance, on page 10, step 106 adds information as to the severity of the message, i.e., into the associated selection field. The text to be formatted is entered into a first text field, such as in step 92. However, the user can edit a formatted message in the complete formatted message in area 82, through use of the information added in step 106, (such as described on page 9, lines 29 – page 10, line 4) in field 72 of FIGURE 2. The final structure of the formatted message of claim 1 is therefore a function of both the final format and the data of the associated selection field (e.g., severity of the message), and so on.

Therefore, for at least the above reasons, Applicants submit that Guck does not expressly or inherently describe all of the elements set forth in claim 1, and thus, Guck does not anticipate claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of the 35 U.S.C. §102(b) rejection of claim 1.

Claims 10, 15, 20 and 23 include a recital similar to that of claim 1, as discussed above. Therefore, for reasoning similar to that provided in support of claim 1, Applicant submits that Guck does not anticipate claims 10, 15, 20 and 23.

Claims 21-22 and 24 depend from claims 20 and 23, respectively. By virtue of their dependencies, claims 21-22 and claim 24 are patentable over Guck.

Claims 2-7, 11-14 and 16-19 were rejected under 35 USC 103(a) as being unpatentable over Guck in view of U.S. Patent No. 6,230,173 to Ferrel et al. ("Ferrel").

Ferrel is directed towards a story editor which can save files in a Multimedia Document Format (MDF) file. (Abstract). These multi-media files are then used to provide content for displayed on-line titles. (Column 3, lines 43-45).

However, Ferrel does not make up for the deficiencies of Guck as Guck relates to claims 1, 10, and 15. Therefore, claims 1, 10, and 15, and by virtue of their dependency, claims 2-7, 11-14, and 16-19 are all patentable over the cited combination of Guck and Ferrel.

Therefore, it is respectfully submitted that claims 1-2, 4-7, 10-11, 13, 15-16, 18, 20-21, and 23-24 are patentable over the cited and relied upon references. The allowance of claims 1-2, 4-7, 10-11, 13, 15-16, 18, 20-21, and 23-24 is earnestly solicited.

Respectfully submitted,

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